

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

AUG 23 2017

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

SUPERIOR CLARK,

Defendant.

4:17CR378 HEA/SPM

**INDICTMENT**

The Grand Jury Charges that:

**COUNT ONE**  
**(WIRE FRAUD)**

1. In about January 2017, within the Eastern District of Missouri,

**SUPERIOR CLARK,**

the defendant herein, did knowingly devise and execute and intend to devise and execute a scheme and artifice to defraud and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, in that defendant fraudulently applied for credit by listing false information on her credit application pertaining to her employer, and social security number.

2. It was part of the scheme and artifice that on or about January 27, 2017, defendant presented at Lou Fusz Mitsubishi ("Lou Fusz"), within the Eastern District of Missouri and attempted to purchase a 2014 Chevy Impala from Lou Fusz.

3. It was part of the scheme and artifice that on or about January 27, 2017, defendant attempted to obtain financing to purchase the 2014 Chevy Impala by completing an application that she submitted to Lou Fusz in which she falsely stated in that application that her employer

was "RLW Property Insurance" and that she had been employed there for three years and six months. Defendant also provided a social security number that ended in the numbers 8846 that was not assigned to defendant.

4. It was part of the scheme and artifice that on or about January 27, 2017, Lou Fusz submitted defendant's application to several lenders, including, but not limited to PNC Bank, NA ("PNC Bank") in Pittsburgh, Pennsylvania, by wire communication to obtain a financing agreement to enable defendant to purchase a vehicle from Lou Fusz. This application contained false information that pertained to defendant's employer and social security number.

5. It was part of the scheme and artifice that on or about January 27, 2017, defendant was approved by PNC Bank for financing for the 2014 Chevy Impala, the dealership released the vehicle to defendant, and defendant left the Lou Fusz dealership.

6. It was part of the scheme and artifice that on or about January 27, 2017, after defendant left Lou Fusz with the 2014 Chevy Impala, Lou Fusz determined that the social security number that defendant provided for the purchase of the vehicle was not assigned to defendant and demanded that she return the vehicle. Defendant initially declined to return the vehicle, but it was ultimately returned to Lou Fusz the next day.

7. On or about January 2017, in the Eastern District of Missouri,

**SUPERIOR CLARK,**

the defendant herein, for the purpose of executing the aforementioned scheme and artifice to defraud and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, signals, pictures, and sounds, in that defendant submitted to Lou Fusz a credit application that she caused to be sent by wire communication in interstate commerce from the Eastern District of Missouri to PNC Bank, outside of the state of

Missouri, for purchase of a 2014 Chevy Impala, with said application containing false information pertaining to defendant's employer, and social security number.

In violation of Title 18, United States Code, Section 1343 and 2.

A TRUE BILL.

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FOREPERSON

CARRIE COSTANTIN  
Acting United States Attorney

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ANTHONY L. FRANKS, #50217MO  
Assistant United States Attorney